

The Honorable Richard A. Jones  
The Honorable J. Richard Creatura

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

EL PAPEL, LLC, et al.,

Plaintiffs,

v.

JENNY A. DURKAN, in her official  
capacity as the Mayor of the City of  
Seattle; THE CITY OF SEATTLE,  
municipal corporation; and ROBERT W.  
FERGUSON, in his official capacity as  
Attorney General of the State of  
Washington,

Defendants.

NO. 2:20-cv-01323-RAJ-JRC

DEFENDANTS' JOINT NOTICE  
OF SUPPLEMENTAL  
AUTHORITY

Pursuant to LCR 7(n), Defendants respectfully submit the recent summary judgment order of the U.S. District Court for the District of Maryland in *Willowbrook Apartment Associates, LLC v. Mayor & City Council of Baltimore*, No. 20-cv-01818-SAG, 2021 WL 4441192 (D. Md. Sept. 27, 2021), as supplemental authority in support of their Cross-Motions for Summary Judgment and reply briefs in support of those motions (Dkt. Nos. 103, 104, 120, and 121). The order is attached as Exhibit 1.

DATED this 5th day of October, 2021.

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2 Attorney General

3 /s/ Cristina Sepe

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*Attorneys for Defendants City of Seattle*  
*and Jenny A. Durkan, in her official*  
*capacity as the Mayor of the City of Seattle*

**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will send notification of such filing to all counsel of record.

DATED this 5th day of October, 2021, at Tacoma, Washington.

/s/ Cristina Sepe  
CRISTINA SEPE, WSBA No. 53609  
Assistant Attorney General